



Andrew Perrong <a@perronglaw.com>

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## Chavez v. Rebuilt matter

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**Pullos, Michael** <Michael.Pullos@us.dlapiper.com>

Wed, Jan 22, 2025 at 4:36 PM

To: Jacob Bach <jbach@mgl.law>, "a@perronglaw.com" <a@perronglaw.com>

Cc: "Carey, Joe" <Joe.Carey@us.dlapiper.com>

Dear Andrew and Jacob:

On behalf of non-party Sinch America, Inc. and ClickSend, we are producing the corresponding 12 months of records with message content. It is possible that not every single message was recoverable as this data all resided on backup storage and required engineers to retrieve the data. Please note that the data you requested is being produced as native TSV files, which is the only file type in which we're able to produce this data. The production is bates stamped CLICK0000001-6 (slipsheets attached). My colleague will share the production via ShareFile with you shortly.

As previously indicated, we are requesting that the company be reimbursed \$1,600 because of the undue burden and costs of compliance imposed by this request that required network engineers to retrieve the data from backup storage that is not readily accessible. Please confirm that the payment will be made.

This completes the company's response to the subpoena.

Best regards,

Michael

**Michael S. Pullos**

Of Counsel

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